



Eric Eisenberg <ericeis@gmail.com>

Correspondence from Eric Eisenberg

Eric Eisenberg <ericeis@gmail.com>

Thu, Mar 7, 2024 at 6:24 PM

To: Anthony Iannarelli <anilaw2@gmail.com>

Cc: "Devine, Kerri A. (Law)" <kdevine@law.nyc.gov>, Genan Zilkha <gzilkha@law.nyc.gov>

Dear Mr. Iannarelli,

I assume from the lack of response that you have no intention of responding to my below emails. Please let me know if this is incorrect.

It appears from your refusal to meet and confer that I have no option other than to raise this matter with the Court.

Respectfully yours,
Eric Eisenberg

On Tue, Mar 5, 2024 at 3:43 PM Eric Eisenberg <ericeis@gmail.com> wrote:

Mr. Iannarelli,

Please advise as to when you will be responding as to (1) whether you will be providing me with a copy of document D.I. 50, and (2) your availability to meet and confer regarding your refusal to provide this document and your filing under seal based on a misrepresentation that a sealing order had been issued.

Best,
Eric Eisenberg

On Fri, Mar 1, 2024 at 1:55 PM Eric Eisenberg <ericeis@gmail.com> wrote:

Dear Mr. Iannarelli,

I still have not received a response from you as to whether or not you will be providing me with a copy of the document filed as docket item 50. Per the below docket entry, this was filed under seal based on a (false) representation that docket item 19 was a "Motion or Order to File Under Seal." To the extent you will not be providing me with a copy, please let me know your availability to meet and confer regarding your refusal to provide the document and your apparent fraud on the Court.

Date Filed	#	Docket Text
02/19/2024	50	***SELECTED PARTIES*** LETTER MOTION for Extension of Time addressed to Magistrate Judge Valerie Figueredo from Anthony Iannarelli dated 02/19/2024. Document filed by Mohamed John Akhtar, Eric Adams.Motion or Order to File Under Seal: 19 . (Iannarelli, Anthony) (Entered: 02/19/2024)

Respectfully yours,
Eric Eisenberg

On Thu, Feb 29, 2024 at 12:33 PM Eric Eisenberg <ericeis@gmail.com> wrote:

I am confused as to what your request is, but my request is clear.

Please provide a copy of docket item 50, which you filed under seal, fraudulently, by claiming docket item 19 was a sealing order. Docket item 19 is not a sealing order. There is no sealing order in this case.

On Thu, Feb 29, 2024 at 12:25 PM Anthony Iannarelli <anilaw2@gmail.com> wrote:

Mr. Eisenberg, My letter was submitted to all counsel and there is no need for Court intervention. I am sure my colleagues at the Bar are responsible individuals, and what I asked for should be labeled as "common courtesy." Your reply is non-responsive to my concerns, nonetheless, I expect all parties to comply, as I've asked, in the future. Thank you A. Iannarelli

On Thu, Feb 29, 2024 at 11:58 AM Eric Eisenberg <ericeis@gmail.com> wrote:

Mr. Iannarelli,

I am in receipt of your below email. I note that the referenced correspondence was not submitted to the court.

However, as you falsely referenced D.I. 19 as a sealing order in connection with your filing under seal of D.I. 50, can you please provide me with a copy of D.I. 50? Thank you.

Respectfully yours,
Eric Eisenberg

On Thu, Feb 29, 2024 at 11:52 AM Anthony Iannarelli <anilaw2@gmail.com> wrote:

Dear Counsel, Reference correspondence from Eric Eisenberg ,dated February 24, 2024, to M.J. Figueredo. In what Mr. Eisenbreg has enumerated as "First," there is a statement that "I have twice written to counsel for the City Defendant,...but I have not received an update in response to either inquiry."

I was not aware of any such correspondence and, because Mr. Eisenberg is utilizing that information in support of a motion, I should have been made aware of its existence. (I also note there is not a Protective Order in existence.)

Since this is substantive evidence that can impact upon a motion before the Court, I ask that, in the future, I be made aware of such correspondence.

Thank you for your attention to the above. A./.

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